

## **REMARKS**

Claims 1-6, 8-11 and 19-22 are pending and at issue in the application with claims 1, 19, 20 and 21 being independent claims. Claim 1 has been amended. As such, 4 independent claims remain in the application as previously paid for, and 14 total claims remain in the application as previously paid for. The applicants believe no fee is due. However, the Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required under 37 CFR 1.16 or 1.17 to Deposit Account No. 13-2855. Reconsideration and withdrawal of the rejections in view of the remarks below is respectfully requested.

The applicants respectfully traverse the rejection of claims 1, 2, 4, 10, 11 and 19-22 as unpatentable over Hamzehdoost et al. (U.S. Patent No. 5,430,331) in view of Ohno et al. (U.S. Patent No. 5,227,662). The applicants further respectfully traverse the rejections of claims 3, 5, 6, 8, 9, 11, 19 and 20 as unpatentable over Hamzehdoost et al. in view of Ohno et al. and further in view of one or more of Majumdar et al. (U.S. Patent No. 5,703,399), McCarthy et al. (U.S. Patent No. 3,956,726), Tomita et al. (U.S. Patent No. No. 5,440,169) and Ikeda et al. (U.S. Patent No. 5,635,751).

Each of claims 1-6, 8-11 and 19-22 recites a semiconductor power module that includes a heat sink having an electrically insulating property (or thermally conductive electrical insulator) and thermal conductivity, and that directly contacts the lead frame and has a surface exposed to the outside of the semiconductor power module. The heat sink or electrical insulator of each of claims 1-6, 8-11, and 19-22 has a surface exposed to the outside of the semiconductor power module. Claim 1 has been amended to correct a minor informality.

Hamzehdoost et al. discloses the heat sink made of only aluminum nitride material (see column 6, lines 20-25), as distinguished from the recited heat sink having both an electrically insulating property and thermal conductivity. Furthermore, Ohno et al. discloses the composite lead frame including the lead frame 28, the plastic film 22' and the rigid metal 14/heat sink 40, with only the heat sink 40 exposed to the outside, thereby making it different from both

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Hamzehdoost et al. and from claims 1-6, 8-11 and 19-22. That is, the plastic film 22' and the rigid metal 14 of Ohno et al., as well as the inner lead portion 12 being separated from the rigid metal 14/heat sink 40 of Ohno et al., are not disclosed in Hamzehdoost et al., and the lead frame with the different heights of Hamzehdoost et al. is not disclosed in Ohno et al. Furthermore, it is not reasonable that disclosure of only an aluminum nitride material is cited for the purpose of disclosing an electrically insulating property and thermal conductivity.

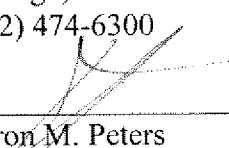
Accordingly, each of claims 1-6, 8-11 and 19-22 is different from Hamzehdoost et al. and Ohno et al. In addition, for the additional reasons stated in the previous response dated April 27, 2007, there is no motivation to combine Hamzehdoost et al. and Ohno et al. and it is noted that the official action has yet to fully address and consider the applicants' arguments regarding the same as pointed out in the previous response. As such, it can only be assumed that the asserted conclusion of obviousness is based solely on improper hindsight reasoning.

For the foregoing reasons, reconsideration and withdrawal of the rejections of the claims and allowance thereof are respectfully requested. Should the examiner wish to discuss the foregoing, or any matter of form, in an effort to advance this application towards allowance, the examiner is urged to telephone the undersigned at the indicated number.

Respectfully submitted,

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